

# *Language Assistance Plan*

Providing Access to Sound Transit Services for Limited English Proficiency Persons



*Four-Factor Analysis and Implementation Plan*

2022

## BACKGROUND

Sound Transit prepared this analysis and implementation plan, which forms the agency's Language Assistance Plan (LAP). The plan is in place to meet requirements stemming from Title VI of the Civil Rights Act of 1964 concerning access to services for people with limited English proficiency (LEP). It also responds to Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, which directs recipients of federal funding to take reasonable steps to ensure that people with limited English proficiency have meaningful access to their programs and activities.

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. As a recipient of federal financial assistance, Sound Transit must ensure the distribution of federally supported transit services and related benefits in an equitable manner.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000) and Federal Transit Administration (FTA) Circular 4702.1B require recipients to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for LEP persons.

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Sound Transit has updated its Four-Factor Analysis as part of the 2022 Title VI Program Update.

Beginning more than 20 years ago, with its activities to implement the regional transit system, especially light rail, Sound Transit has conducted outreach to a wide variety of communities whose members include persons that are LEP. Those activities have evolved over time into practices that have been replicated and expanded as the agency has learned more about the communities served and the need for language-assistance services to a variety of non-English-speaking groups in the areas where transit services are provided.

## FOUR-FACTOR ANALYSIS

In order to determine how to provide meaningful access (or improve access), transit systems are to conduct a "Four-Factor Analysis" and provide this analysis to FTA. Sound Transit updated its Four-Factor Analysis as part of this Language Assistance Plan update. This updated analysis helps inform the agency's Public Participation Plan.

The agency studies meaningful access by considering four factors as outlined below.

### **Meaningful access is based on four factors:**

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come into contact with Sound Transit's programs, activities and services.
3. The importance to LEP persons of Sound Transit's programs, activities and services.
4. The resources available to the recipient and costs.

**FACTOR 1 – The number and proportion of LEP persons served or encountered in the eligible service population**

Sound Transit has provided an assessment of the total LEP populations within its service area. This information is based on 2019 Census data release from the American Community Survey; 2020 Census data had not been released at the time this analysis was conducted.

Analysis of 2020 Census data showed that the total population within the Sound Transit District is approximately 3,690,250 and LEP populations represent an estimated 335,736, or 9.1 percent. Since the previous LEP population analysis based on 2018 Census data from the American Communities Survey, the total population increased by nearly 677,000 or 22 percent, while the LEP population has increased 42,074 or 14 percent. The total percent of the LEP population compared to the total population decreased slightly from 9.9 percent to 9.1 percent.

Sound Transit reviewed the largest groups speaking a language other than English at home. A table of the languages, the percent of foreign language speakers and the percent of the total population in the Sound Transit District appears in LAP Appendix A. There are also language groups that while combined do not reflect a numerical breakdown of the subset of languages within that group. As such, it is not feasible to prepare documents ahead of a specific request or an identified need associated with public participation efforts in compliance with Title VI. The combined language groupings appear in LAP Appendix A.

**Languages Spoken at Home**

The Sound Transit district is very large (1,087 square miles across part of three counties). Because it is not feasible to provide translated materials in all languages identified, Sound Transit examined the six largest groups listed for languages spoken at home (see Table 1). For each of these groups, more than 25,000 people and one percent or more of people within the district speak that language at home.<sup>1</sup> This includes people who both are and are not proficient in English.

*Table 1: Languages Spoken at Home*

<b>Home-spoken Language</b>	<b>Pop. Within Sound Transit Dist.</b>	<b>% of Sound Transit Dist. Pop.</b>
<b>Spanish</b>	241,211	6.5%
<b>Chinese</b>	104,509	2.8%
<b>Russian, Polish, and other Slavic languages<sup>1</sup></b>	65,980	1.8%
<b>Vietnamese</b>	51,439	1.4%
<b>Tagalog</b>	46,463	1.3%
<b>Korean</b>	43,712	1.2%
<b>Sound Transit District Total Population</b>	3,690,250	15.0%

<sup>1</sup> Starting in 2019, Russian data is combined as “Russian, Polish and Other Slavic Languages”. In 2014, it was reported on its own. (For further information, see LAP Appendix A). Because it exceeded the Safe Harbor threshold in 2014, it is assumed to exceed it still today and is therefore still reported here.

The number of people speaking Spanish at home continues to be the single largest group and makes up nearly seven percent of the Sound Transit District population.

**Persons speaking English “Less than very well”**

The assessment of home-spoken languages is an important piece of information, but does not on its own indicate the English proficiency levels of people who speak other languages at home. Using the DOT definition of LEP (those who self-report their English ability as less than “very well”) and further analyzing the Census data, Sound Transit was able to determine the six largest groups and their portions of the LEP population and of the Sound Transit District as shown in Table 2.

**Table 2: Percentage who speak English "Less than very well"**  
(Source: 2020 American Community Survey)

<b>Top Six LEP Languages</b>	<b>LEP Pop. in Sound Transit District</b>	<b>% of Sound Transit LEP population</b>	<b>% of Sound Transit Dist.</b>
<b>Spanish</b>	92,086	27.4%	<b>2.5%</b>
<b>Chinese</b>	50,820	15.1%	<b>1.4%</b>
<b>Vietnamese</b>	30,313	9%	<b>0.8%</b>
<b>Russian, Polish, Slavic languages</b>	26,236	7.8%	<b>0.7%</b>
<b>Korean</b>	22,962	6.8%	<b>0.6%</b>
<b>Tagalog</b>	16,269	4.9%	<b>0.4%</b>
<b>Total of Top Six LEP Languages</b>	<b>238,686</b>	<b>71.1%</b>	<b>6.5%</b>

These six language groups comprised an estimated 238,686 persons or 71.1% of the total estimated LEP population of 335,700 in 2020.

Of the top six LEP language groups, Spanish is by far the largest single LEP group in the Sound Transit District with an estimated population of 92,086. There are many more Spanish speakers who speak English “Very well”. The Spanish language LEP group makes up 27.4 percent of the LEP population and 2.5 percent of the people in the Sound Transit District. Chinese is the second largest LEP language group with 50,820, 15.1 percent of the LEP population and 1.4 percent of the people in the Sound Transit District.

Each of the remaining four language groups (Vietnamese, Korean, Tagalog and Russian/Polish/Slavic languages) are spoken by fewer than 10 percent of the LEP population and fewer than 1% of people in the Sound Transit District, but they do exceed the Safe Harbor threshold because they are spoken by more than one thousand people in the district, so these languages must be considered.

Compared with 2019, the top six languages comprise a slightly smaller portion of LEP speakers, suggesting that linguistic diversity is increasing. At the same time, they represent a slightly smaller share of the ST district overall.

**Comparison with LEP requirements in education**

Part A of Title III of the Federal No Child Left Behind Act of 2001, is officially known as the English Language Acquisition, Language Enhancement and Academic Achievement Act. It is specifically targeted to benefit LEP children and immigrant youth. The act states that LEP students must not only attain English proficiency but simultaneously meet the same academic standards as their English-speaking peers in all content areas. In the state of Washington, Title III LEP requirements are met under the Transitional Bilingual Education Program (TBIP). The most commonly spoken languages by TBIP students in the school districts within Sound Transit’s service area are:

**Table 3: TBIP Student Languages in School Districts**

<b>Language</b>	<b>Number of Students</b>
<b>Spanish</b>	28,514
<b>Vietnamese</b>	2,397
<b>Russian</b>	2,263
<b>Somali</b>	1,815
<b>Arabic</b>	1,518
<b>Ukrainian</b>	1,449
<b>Chinese-Mandarin</b>	1,184
<b>Dari</b>	1,061

Schools also provide enrollment numbers of students considered English Language Learners. Among school districts within the Sound Transit district, 11.9% of enrolled students were considered English Language Learners in the 2020 – 2021 school year.

Many school districts and tribal schools in the Sound Transit district also offer dual-language programming, where students learn in both English and another language. Many students enrolled in dual-language programs speak the second language at home with their families; therefore, enrollment in these programs can serve as a proxy for major language groups in an area.

Table 4 shows the most common languages offered in dual-language programs for the 2019 – 2020 school year in the Sound Transit district.

**Table 4: Dual-Language Programs in School Districts**

<b>Language</b>	<b>Number of schools with a program</b>
<b>Spanish</b>	31
<b>Vietnamese</b>	2
<b>Mandarin</b>	2
<b>Lushootseed</b>	1
<b>Muckleshoot</b>	1

## **Comparison with court interpreter data**

In Washington State, parties in court cases have the right to an interpreter. The three counties within the Sound Transit service area each have their own Language Access Plans that identify the languages used most often in cases where interpreters are needed.

The languages identified as the most frequently used in one or more county courts as of 2018 are:

- Spanish
- Vietnamese
- Russian
- Mandarin
- Somali
- Korean
- ASL

Additionally, these languages are identified as growing in representation and in need of future resources:

- Amharic
- Arabic
- Swahili
- Chuukese
- Punjabi
- Farsi

The most frequently used languages align very closely with Sound Transit's top 6 languages for translation, with the exception of Tagalog being replaced by Somali. Some of the emerging languages have not been previously identified by Sound Transit; this information can serve as the basis for further research into the breadth of these languages in the region.

## **Comparison with data from other county services**

People accessing benefits through the Women, Infant & Children (WIC) program or through the county public health clinics also have the right to an interpreter. Data on interpreter usage for these services tracks closely with the top languages identified by the courts. In addition, the following less common languages had more than 1000 visits to WIC and/or public health clinics by clients requesting an interpreter from 2020 - 2021:

- Ukrainian
- Dari (Afghan Persian)
- Tigrinya

## **Assess whether LEP populations are underserved due to language barriers**

Sound Transit's annual Passenger Experience survey was fielded in fall 2021. Of nearly 5,000 respondents, only 2.5% identified as speaking English less than "very well," with another 10%

speaking other languages but also speaking English very well. These figures are lower than representation of LEP individuals in the region overall, suggesting that LEP individuals were underrepresented on the survey.

Respondents were asked to give Sound Transit a letter grade for the quality of information that ST provides its passengers. While both English-proficient and LEP riders on average gave a B grade, the average for LEP riders corresponded to a 2.73 on a grade point scale (maximum possible score: 4.3) and the average for English-proficient riders corresponded to a 2.91. This suggests that ST may be able to improve the way that it communicates with LEP riders, but also that all riders would benefit from improvements in communication overall. Further research may identify the best way to do this.

Respondents were also asked to give Sound Transit a letter grade overall. While the average for English proficient riders corresponded to a 3.12, the average for LEP riders corresponded to a 2.8. Further research will help identify the factors that were most important for LEP riders in influencing their overall score.

LEP individuals are represented proportionally in the area nearest Sound Transit stops and stations. While 10.1% of the residents of the Sound Transit district identify as LEP, 10.5% of those living within access distance<sup>2</sup> of a stop or station identify as LEP.

Engagement with community-based organizations illuminated some of the barriers that LEP individuals face when using transit. The feedback yielded the following insights:

- The services provided by our interpreter phone line may not be well known or intuitive to navigate
- Some populations may not be literate in their home language, so translations are not helpful
- Affordability of fares and knowing how to pay a fare is also a barrier to some
- LEP persons with disabilities experience compounded challenges when using our system
- LEP populations benefit most from in-person education and instruction on how to navigate our system

## **FACTOR 2 – The frequency with which LEP individuals come into contact with Sound Transit’s programs, activities and services**

### **Over-the-phone interpreter services**

Sound Transit has used over-the-phone interpreter services as its primary method of providing assistance to LEP persons for accessing transit service dating back to at least the year 2000. A language block is provided at <https://www.soundtransit.org/help-contacts/translation-services>, directing speakers of six key languages to contact Sound Transit's language line for information in their languages.

Sound Transit's telephone interpreter service records are the most reliable and direct information available to document contacts by LEP persons regarding Sound Transit services. The interpreter services are provided Monday-Friday from 7AM-7PM and are provided in over 100 languages.

Table 5 shows the calls handled, by language, between October 1, 2018 and October 31, 2021.

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<sup>2</sup> Access distance is defined as ½ mile from a bus stop without parking, 2.5 miles from a major bus facility, 1 mile from a rail station without parking, and 5 miles from a rail station with parking.

**Table 5: Calls to the Language Line**

Language	Minutes	Calls	Avg Call Length (mins)	Percent of Total Calls
<b>Spanish</b>	1,398.70	160	8.74	42.33%
<b>Korean</b>	289.50	35	8.27	9.26%
<b>Mandarin</b>	330.20	33	10.01	8.73%
<b>Vietnamese</b>	398.40	33	12.07	8.73%
<b>Cantonese</b>	288.20	24	12.01	6.35%
<b>Russian</b>	212.40	23	9.23	6.08%
<b>Chinese</b>	91.40	13	7.03	3.44%
<b>Somali</b>	256.10	12	21.34	3.17%
<b>French</b>	59.10	7	8.44	1.85%
<b>Japanese</b>	71.00	6	11.83	1.59%
<b>Arabic</b>	36.70	6	6.12	1.59%
<b>Arabic-Egyptian</b>	161.30	5	32.26	1.32%
<b>Wolof</b>	45.00	4	11.25	1.06%
<b>Tagalog</b>	15.60	3	5.20	0.79%
<b>Tigrinya</b>	21.10	2	10.55	0.53%
<b>Cambodian (Khmer)</b>	16.90	2	8.45	0.53%
<b>Dari</b>	52.40	2	26.20	0.53%
<b>Swahili</b>	21.40	2	10.70	0.53%
<b>Mongolian</b>	5.40	1	5.40	0.26%
<b>Oromo (Oromifa)</b>	4.00	1	4.00	0.26%
<b>Farsi (Persian)</b>	6.10	1	6.10	0.26%
<b>Filipino</b>	3.40	1	3.40	0.26%
<b>Amharic</b>	4.10	1	4.10	0.26%
<b>Thai</b>	19.10	1	19.10	0.26%
<b>Totals</b>	<b>3,807.50</b>	<b>378</b>	<b>10.07</b>	

The total cost of providing this service was \$2,433.62 over three years.

In addition, Sound Transit's website uses Google translate to translate information into any language covered by Google's services (108 languages as of December 2021) by clicking on a link present on every page.

### **Origin and destination survey**

From 2018-2019 the agency conducted an Origin and Destination Survey to assess ridership on all of its modes of service. Data included information from survey participants based on the language spoken at home, and is shown in Table 6.



**Table 6: Ridership Frequency and Percent of Languages Regularly Spoken at Home  
(2018-2019 O/D Survey)**

Language	Number of Respondents	Percent of Respondents*
English	25,267	87.2%
Spanish	1,577	5.4%
Mandarin	833	2.9%
Vietnamese	640	2.2%
Tagalog	542	1.9%
Cantonese	440	1.5%
Korean	338	1.2%
Russian	264	0.9%
Somali	190	0.7%
Other	1431	4.9%
<b>Total</b>	<b>31,522</b>	

\*Total exceeds 100% because respondents could select more than one language.

### Front-line staff survey

A survey of 254 front line staff asked how often staff encounter LEP riders. These staff included bus and train operators, fare ambassadors, customer service agents, security staff, and station agents. Results are shown in Table 7. The questions asked in the survey are included in Appendix C.

**Table 7: Front-Line Staff Frequency of Contact with LEP Riders**

Frequency	Percent of Respondents
Never	1.6%
Three times a year or less	1.2%
Once a month or less	1.6%
Between once a month and once a week	38.9%
2 – 3 times per week	32.8%
4 – 9 times per week	15.2%
10 or more times per week	8.6%

Bus operators and security staff reported the highest levels of contact with LEP riders. Sounder train conductors reported the lowest levels of contact.

### **FACTOR 3 – The importance to LEP persons of Sound Transit’s programs, activities and services**

This section provides an assessment of the importance of Sound Transit’s services and programs to LEP populations.

**Quantitative Information**

Sound Transit’s 2020 Passenger Experience Survey revealed some patterns about how LEP passengers use transit differently than English proficient passengers. While LEP riders accounted for only 2.5% of the overall survey respondents, they made up 6% of those who said that they primarily travel for commute trips off-peak and 5% of those who said their primary mode of travel was Tacoma Link.

Several areas with proximity to Sound Transit service stand out as areas with concentrated LEP populations. These include Seattle’s Rainier Valley, SeaTac, Bellevue, Burien, Kent, Everett, Lakewood, Federal Way, and the University District. Several of these areas are served by routes that experienced a smaller than average ridership decline throughout the COVID-19 pandemic as people who depend on transit continued riding for essential trips. Route 574, which serves three of these cities, experienced the least ridership decline of all bus routes from Q4 2019 to Q4 2020, at 57%. Moreover, three of the five bus routes which retained the highest daily ridership throughout 2020 (Route 512, 545, and 550) were also routes with a high concentration of LEP passengers.

A 2019 Puget Sound Regional Council survey of Puget Sound households (including both riders and non-riders) asked respondents how important proximity to transit was in their choice of where to live. Among respondents who speak a language other than English, 26% said that proximity to transit was very or somewhat important to their choice. This ranked lower than a walkable neighborhood (34%) and affordability (47%), but about the same as proximity to family or to a school or highway.

**Qualitative Information**

Sound Transit interviewed Open Doors for Multicultural Families, a community-based organization that serves linguistically diverse individuals with cognitive disabilities, to learn more about the importance of transit in their clients’ lives. ODMF staff reported that the individuals and families they serve rely heavily on transit and make frequent use of discounted fare payment options. ODMF conducted a survey of daily support needs of their clients, and transportation was the second highest-ranked option, after grocery shopping.

Through this engagement, Sound Transit also gathered information about how to better serve LEP passengers. ODMF suggested offering in-person instruction on how to use transit, sign up for discounted fare programs, use a trip planner app, or call the interpreter line. They also suggested translating text to a 3<sup>rd</sup> grade reading level and reducing reliance on text in general.

**FACTOR 4 - The resources available to the recipient and costs**

Sound Transit uses a variety of language assistance methods through all of its activities including; environmental study and design, construction, and operations and customer service (shown in Table 8). Sound Transit has developed a Language Access Toolkit to help guide its interactions with LEP populations.

**Table 8: Language Resources Available**

Language Service	Phase or Service		
	Environmental Study and Design	Construction	Operations and Customer Service

<b>Written materials translated into major language groups</b>	X	X	X (Key Documents) <sup>3</sup>
<b>Interpretation services at public meetings (live and Zoom)</b>	X	X	
<b>Language line phone service</b>	X	X	X
<b>Using nonverbal messages, picture, and illustrations</b>			X
<b>Ticket Vending Machine Translations</b>			X (Spanish and Chinese currently, expanding to the top six languages with new ORCA)
<b>Staff Translation/ Interpretation Roster</b>	X	X	X
<b>Front Line Staff with Language Assistance Cards (see Appendix B)</b>	n/a	n/a	X

### **Translation of written materials**

Sound Transit produces translated versions of vital documents in the most commonly spoken languages as outlined by the Four-Factor Analysis. The agency continues to explore the costs and merits of other customized publications and the most effective distribution methods for reaching the region’s major LEP language group populations. In addition, we have a translation vendor under contract. Between March 2020 and October 2021, we used that contract for nearly 100 projects to *translate various written materials into up to seven different languages.*

### **Interpretation services at public meetings (and related services)**

Sound Transit has on-going practices that ensure that community outreach activities are accessible to non-English speaking persons to make sure that they can participate in them meaningfully. These include:

- Making in-person interpreter services available upon request for public meetings and important events.
- Using Zoom’s on-demand interpretation services during virtual public meetings.
- Translating, posting online and distributing to community groups and service providers in the project area key printed documents such as project information, environmental documents, etc.
- Inserting language blocks into non-translated print publications, to let LEP persons know what the material is about and how they can contact Sound Transit to learn more.
- Placing non-English language ads into publications that serve LEP persons to inform them of project-related issues (e.g. release of environmental documents, safety information).

<sup>3</sup> Sound Transit translates the Ride with Us Brochure, Link Pocket Schedules, ORCA card information, and the Regional Reduced Fare Program application and information.

## **Language line phone services**

As discussed in Factor Two above, Sound Transit provides over-the-phone interpreter services to LEP persons on an individualized basis. The cost of providing such services is approximately \$1 per minute. Sound Transit has determined this to be a cost-effective way to respond to the needs of LEP individuals since it directly involves persons interested in using the transit system throughout the region.

## **Using nonverbal messages and illustrations**

Sound Transit's style guide includes both icons and illustrations that help communicate without using words. The icons bypass language and literacy barriers and act as a visual language to help our riders navigate our transit system.

## **Ticket vending machines**

Sound Transit uses a combination of written and oral alternative language services in Spanish and Chinese (Mandarin) on its point-of-sale ticket vending machines. Ticket vending machines are located at all Sound Transit stations and provide fare information for Link light rail, Sounder and the regional ORCA smart card.

In 2022, the new ORCA program will be rolling out to the region with an improved rider experience with enhanced language translation services. The updated website, new app, retail provider, advertising and ticket vending machines will be available in English, Chinese, Korean, Russian, Spanish, Tagalog, and Vietnamese.

## **Foreign language staff volunteer roster**

The agency maintains a roster of employees who speak multiple languages and are available to support in-person outreach efforts and double check translated materials. There are approximately 18 staff representing seven different languages.

## **Frontline staff**

Frontline staff who speak languages other than English can carry cards or wear buttons that let passengers know what languages they speak. All front-line staff can also provide language assistance cards to LEP passengers that provide information on how to get information in other languages.

In addition, Sound Transit is developing an e-learn as part of our ambassador training series. The e-learn will help educate staff about how to better serve the LEP passengers they might encounter during their ambassador shifts. This training will launch in 2022.

As Sound Transit began to develop services to provide responsive assistance to non-English speaking persons, staff found the most effective way to do so was to provide over the phone interpretive services in which a person can get specific information tailored to their needs, including follow-up questions and answers. This mirrors in the field interpretive services during construction when individual residents may be impacted by the various activities taking place. It also mirrors on-site interpretive services provided to LEP community members to facilitate their ability to participate at community outreach and construction update meetings.

Sound Transit staff have also learned that providing oral interpretive services also serves various subsets of the LEP populations who are not able to read and write the languages they speak.

**Front line staff strategies for assisting LEP passengers**

The survey of 254 front-line staff, including bus operators, train conductors, station agents, customer service agents, fare enforcement and security personnel asked staff which techniques they rely on to communicate with LEP passengers. Results are in Table 9 (*total does not sum to 100% because respondents could select multiple options*).

**Table 9: Techniques for Communicating with LEP Passengers**

<b>Technique</b>	<b>Percent of respondents</b>
<b>Gestures, pointing, etc.</b>	61.9%
<b>Communicate in any English the passenger is able to speak or write, however limited</b>	49.2%
<b>Technology such as Google Translate or Google Interpreter</b>	36.9%
<b>Communicate through a person traveling with the passenger who speaks English and can interpret</b>	30.6%
<b>Communicate in another language that both parties speak.</b>	28.2%
<b>Refer the passenger to a nearby passenger who speaks their language</b>	24.2%
<b>Language line telephone interpretation service</b>	19.4%
<b>Show passenger printed brochures or signs translated into their language</b>	15.1%

Two percent of staff indicated that they sometimes avoid communicating with a passenger because they are not confident they can help them. While this percentage is small, this indicates that further training may be needed.

Survey respondents also indicated their confidence in their ability to assist LEP passengers. 57% of respondents said they feel mostly or very confident assisting LEP passengers, with another 35% saying they feel somewhat confident.

While some staff indicated that they used the language line, about half of the survey respondents were bus and train operators, who noted that it is illegal and unsafe for them to use the phone while driving. These staff must rely on other means to communicate with LEP passengers. Staff suggested ways to improve their confidence, including better access to translation apps on their work cell phones, or better language and communication training for those who could not use handheld devices while driving.

Staff themselves are often a resource for LEP passengers. About 30% of respondents indicated that they sometimes are able to communicate with passengers in a language that they both speak. These languages included:

- Spanish
- Chinese

- Amharic
- French
- Arabic
- German
- Japanese
- Korean
- Oromo
- Swahili
- Kikuyu
- Sign language
- Russian
- Somali
- Hungarian
- Samoan
- Tagalog
- Creole

## Costs

It is challenging to identify some of the costs associated with supporting LEP persons, because they are included in larger contracts without differentiation, or are included in individual staffing costs without being assigned to translation or interpretation services. Table 10 lays out the specific costs that we can identify. In the future, we will try to put into place systems that enable us to better track these costs.

**Table 10: Selected Costs of Providing Support to LEP Persons**

Item	Cost	Notes
Language Line	\$2,433.62	Covers the three years between 11/1/18 and 10/31/21
Translation Services	\$93,787.30	Covers the period from March 2020 – October 2021 (earlier data are not available)

## CONCLUSION

There are six non-English languages spoken by more than 1% of Sound Transit’s population: Spanish, Chinese, Russian (and other Slavic languages), Vietnamese, Tagalog, and Korean. Sound Transit recognizes the importance of meeting the needs of residents who speak these, and other, languages. The Language Assistance Plan that will be developed using the results of this analysis will ensure that we maintain our current levels of service to LEP populations and improve them over time.

**From the Four-Factor Analysis, Sound Transit has determined:**

- The six largest LEP language groups in the Sound Transit District are (in order): Spanish, Chinese (including Cantonese & Mandarin), Vietnamese, Russian (and other Slavic languages), Korean and Tagalog.
- While a wide array of LEP language groups are found throughout its service district, the largest group prevalent throughout the Sound Transit region is LEP Spanish speakers
- Spanish speakers consistently are the most commonly requested LEP group seeking language assistance services
- While Spanish speakers and Chinese (Mandarin) are the two largest groups, Sound Transit is committed to address the needs of the variety of LEP groups throughout its region. For this reason, Sound Transit has a telephone interpreter service that can accommodate more than 100 languages. In addition, Sound Transit's website was redesigned in 2018 to include Google Translate, an integrated translation function that can automatically translate soundtransit.org content into 103 languages.
- Sound Transit's Community Outreach activities throughout each project's life cycle provide connections to community leaders and information regarding the LEP groups within each project area to reach all potential riders
- Sound Transit continues to expand its non-English communications program in response to the demographic changes experienced in the region

## Implementation plan

FTA requires that transit systems provide "meaningful access" for LEP populations. Meaningful access is based on the four factors outlined in the Four-Factor Analysis section above. The Four-Factor Analysis helps the agency develop an implementation plan. Together the Four-Factor Analysis and the Implementation Plan form the Language Assistance Plan.

Sound Transit balances its overall commitment to the various LEP groups in the region with improvements targeted to the most commonly spoken languages in the region.

Sound Transit will do the following:

- Begin to leverage the new tiered approach for identifying 'Vital Documents' which will help guide Sound Transit on when and where we need to provide translations.
- Develop and deepen relationships with organizations that serve LEP populations to ensure we are responsive to their unique needs.
- Be adept to respond to any LEP person.

## Current language assistance measures that will continue (and be improved upon) for multiple LEP groups

- **Staff training** - Community outreach staff and front-line staff including reception, customer service, station agents and fare ambassadors are trained to respond to LEP individuals in person and using the telephone language line.
- **Community or project specific materials** - All Sound Transit staff and consultants have access to translation services. Key materials for residents should be translated or include a language block for languages relevant to that geographic area.
- **Engage LEP populations directly to gain insight and understand needs** - Survey and meet with community organizations that serve LEP populations to assess, and where appropriate, implement expanded methods to serve LEP transit riders. Where possible, employ

methods to engage directly with LEP persons and obtain direct feedback.

## **Language assistance measures that Sound Transit has implemented as a result of the 2019 Four-Factor Analysis**

As a result of the 2019 Four-Factor Analysis and the Title VI Update Submittal in 2019, Sound Transit has taken these steps to expand its assistance to the LEP populations in its region:

- Worked to identify LEP language needs as new transit projects are being planned.
- Developed guidance for the development of curriculum and the incorporation of LEP information into the Sound Transit employee environment – To prepare staff ambassadors and other relevant staff to effectively engage and respond to LEP customers.
- Updated the Sound Transit Editorial Style Guide, an instructional tool that outlines the look and content of materials produced by staff and contractors, to include the following:
  - Information on how to access interpreters and translations
  - Guidance on using language blocks and the interpreter pictogram
  - Assistance on how to determine LEP persons in the project area. By providing this information early in the planning/outreach phase helps ensure equal access for all.
- Utilization of the “I Speak’ Language Assistance Card (Appendix C) – Sound Transit distributed this to operators of all modes. The cards are also available to other public facing staff including station agents, outreach staff, ambassadors and other staff that interact with the public.
- Included language assistance information on print materials – Sound Transit added the language line number, hours of operations, and six predominant languages on printed materials. The interpreter pictogram will be included in close proximity to the language line number.
- Updated demographic survey questions to gather additional data – This will provide a better understand the LEP populations served.
- Development of the Language Access Toolkit – Created by, and for, outreach and engagement staff. The LAT provides guidance and best practices around internal processes and procedures specific to language access.
- Development of Term Bank – Created by engagement staff, the term bank provides consistent translation in Sound Transit’s 6 core languages for 100 technical and commonly used terms. This provides consistency for vendors when translating these terms, and provides clarity to all LEP populations accessing translated materials.
- Developed and published an Equitable Engagement Tool for agency staff – Provides guidance and best practices to ensure that engagement activities are planned through a lens of equity and accessibility which includes considerations for LEP populations.

## **2022 language assistance measures**

Looking forward and reviewing findings from the Four Factor Analysis, this section outlines languages to be used, determines the most needed information for LEP accessibility, identifies Vital Documents



and outlines a plan for providing resources.

- Ridership demographics and focus groups conducted as part of Factor 3 were considered in determining the agency's top 6 languages that we should pursue at an agency level. Please reference table 2 above for reference.
- Vital Documents are identified in accordance with Title VI and Executive Order 13166 and Sound Transit's Top Six languages. A plan for providing specific documents and resources is outlined below.

## **Vital documents**

Agencies receiving Federal Funding are required to identify Vital Documents that must be translated. Vital documents are defined as any document that is critical for obtaining services and benefits, and/or any documented required by law.

In determining documents needed to provide meaningful access to Sound Transit services for LEP customers, Sound Transit has defined three levels of Vital Documents. This will allow for the prioritization of translated materials according to availability of resources. In some cases, translation of Vital Documents may only consist of only a summary or key points. For other Vital Documents, providing a notice of available language assistance can also provide sufficient access.

For each project, Sound Transit will examine documents against available resources or alternatives. In the Sound Transit taxing district where there are many different languages spoken, written translations may not always be the most effective method of reaching all LEP persons or rendering transit information accessible. In some cases, translation of Vital Documents may consist of a summary or key points, pictograms or translated notice of language assistance.

### **Tier 1 – Safety, security and civil rights**

Information categorized in Tier 1 would have life threatening consequences if not translated or that would deprive riders of an awareness of their legal rights. Providing translation or LEP accessible versions of this type of information is the highest priority of all Vital Documents. Tier 1 documents should be translated into the "safe harbor" languages as determined by the triennial Four-Factored Analysis.

### **Tier 2 – Information critical to access**

Tier 2 includes information that helps LEP passengers to understand Sound Transit service to facilitate ease of use and without translation would seriously impede access to ST service. At minimum, tier 2 documents should be translated into Spanish, the most frequently encountered language at Sound Transit.

### **Tier 3 – Information to empower customers**

This tier of information encompasses materials that help LEP riders to understand and engage with Sound Transit in ways that will enhance or facilitate the customer experience. Tier 3 information will enable LEP persons to participate in Sound Transit's long-term transportation decisions.

**Table 11: Types of information by vital document tier**

Tier	Information Type
<p><b>Tier 1 -Safety, security and civil rights:</b> Information that protects customers' physical safety and informs Sound Transit customers of their legal rights.</p>	<ul style="list-style-type: none"> <li>• Safety and Security information</li> <li>• Notice of Rights</li> <li>• Transit Alerts – Emergency</li> <li>• Rider Conduct Rules/Policy</li> </ul>
<p><b>Tier 2 - Information critical to access:</b> Information that helps LEP patrons to understand Sound Transit service to facilitate ease of use.</p>	<ul style="list-style-type: none"> <li>• Trip planner tool</li> <li>• How to pay</li> <li>• How to ride</li> <li>• How to transfer</li> <li>• Service changes</li> <li>• Schedules and service maps</li> <li>• Transit alerts</li> <li>• Fare rates</li> <li>• ORCA card + pass</li> <li>• Accessibility information</li> </ul>
<p><b>Tier 3 - Information to empower customers:</b> Information and materials that help LEP customers to understand and participate with Sound Transit at higher new level.</p>	<ul style="list-style-type: none"> <li>• Passenger notices</li> <li>• Bike information</li> <li>• Rider etiquette</li> <li>• Station and facilities amenities</li> <li>• Destination Information</li> <li>• Feedback and public involvement opportunities</li> <li>• Expansion Planning info</li> <li>• Construction project updates</li> </ul>

## LAP APPENDIX A

### Language Groups Speaking a Language Other Than English at Home

#### Sound Transit District<sup>1</sup>

	Estimate; Total*	3,013,356		
		<b>Estimated</b>	<b>% of Non-English total</b>	<b>% of ST District pop.</b>
<b>Rank</b>	<b>Home Spoken Language</b>			
1	<b>Spanish:</b>	<b>200,410</b>	<b>27.1%</b>	6.7%
2	<b>Chinese (Includes Mandarin &amp; Cantonese):</b>	<b>83,377</b>	<b>11.3%</b>	2.8%
3	<b>Vietnamese:</b>	<b>48,989</b>	<b>6.6%</b>	1.6%
4	<b>Tagalog (Includes Filipino):</b>	<b>40,528</b>	<b>5.5%</b>	1.3%
5	<b>Korean:</b>	<b>39,451</b>	<b>5.3%</b>	1.3%
6	<b>Russian:</b>	<b>28,583*</b>	<b>3.9%</b>	0.9%
7	<b>German or Other West Germanic Languages:</b>	<b>17,943</b>	<b>2.4%</b>	0.6%
8	<b>French, Haitian, or Cajun:</b>	<b>15,196</b>	<b>2.1%</b>	0.5%
9	<b>Arabic:</b>	<b>12,188</b>	<b>1.6%</b>	0.4%
10	<b>Polish:</b>	<b>2,969*</b>	<b>0.4%</b>	0.1%
			<b>% of ST District (est.)</b>	
	<b>English Only</b>	<b>2,272,979</b>	<b>75.4%</b>	
	<b>Non-English, total</b>	<b>740,377</b>	<b>24.6%</b>	

Source: American Community Survey 2019, five-year estimates. Table 16001.

\*Based on Census data source. May differ from Sound Transit district total population estimates which use a different data source (Washington State Office of Financial Management annual tract estimates.)

Note: 2019 ACS Data included four combined categories that gave no additional breakdown of separate languages as follows:

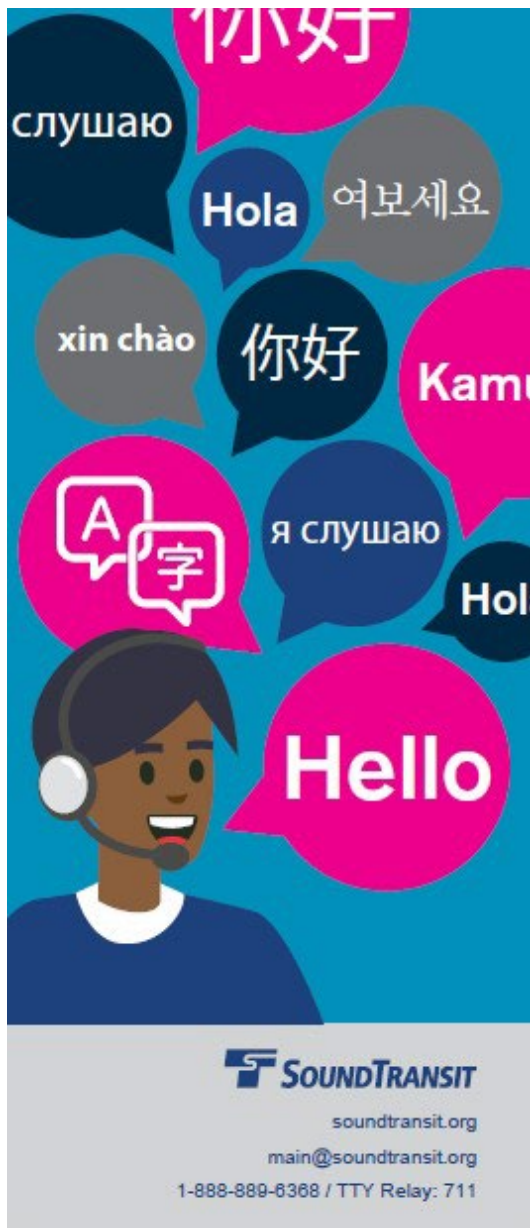
- Other Asian and Pacific Island Languages: 93,515
- Other Indo-European Languages: 85,042
- Russian, Polish or other Slavic Languages: 56,322
- Other and unspecified Languages: 47,416

<sup>1</sup> NOTE: There are 104 languages able to be formatted on the Sound Transit website.

\* Russian is carried over from 2014 data. In 2019 Russian data is combined as "Russian, Polish and Other Slavic Languages". Same treatment for Polish.

## LAP APPENDIX B

### I Speak Language Assistance Card

A graphic for a language assistance card. It features a blue background with several speech bubbles in various colors (pink, dark blue, grey) containing the word 'Hello' in different languages: Russian (слушаю), Chinese (你好), Spanish (Hola), Korean (여보세요), Vietnamese (xin chào), and another Chinese (你好). There are also icons for a speech bubble with 'A' and a speech bubble with Chinese characters. At the bottom, there is a cartoon illustration of a person wearing a headset and a microphone, with a large pink speech bubble saying 'Hello'. Below the illustration is the Sound Transit logo and contact information.

**SOUNDTRANSIT**  
soundtransit.org  
main@soundtransit.org  
1-888-889-6368 / TTY Relay: 711

#### **Language Assistance**

Information and assistance in your language is available upon request. Please contact us at 1-800-823-9230.



#### **Spanish**

Asistencia lingüística para los pasajeros de Sound Transit  
La información y asistencia en su idioma se encuentra a su disposición, previa solicitud. Comuníquese con nosotros a través del 1-800-823-9230.  
Gracias

#### **Chinese**

向 Sound Transit 乘客提供語言協助  
可應要求提供您所用語言的資訊與協助。請聯絡我們：1-800-823-9230。  
謝謝

#### **Vietnamese**

Hỗ Trợ Ngôn Ngữ Dành Cho Hành Khách  
Sound Transit  
Thông tin và hỗ trợ bằng ngôn ngữ của quý vị được cung cấp theo yêu cầu. Xin vui lòng liên lạc chúng tôi qua số 1-800-823-9230.  
Cảm Ơn Quý Vị

#### **Tagalog**

Tulong na Wika para sa Mga Mananakay ng Sound Transit  
Impormasyon at tulong sa inyong wika ay available kapag hiniling. Mangyaring tawagan kami sa 1-800-823-9230.  
Salamat

#### **Korean**

Sound Transit 이용자를 위한 언어 지원  
요청시 여러분의 언어로 정보 및 지원을 제공합니다.  
1-800-823-9230번으로 저희에게 연락하십시오.  
감사합니다

#### **Russian**

Языковая помощь пассажирам Sound Transit  
По запросу предоставляется информация и помощь на вашем языке. Обращайтесь к нам по телефону 1-800-823-9230.  
Благодарим вас!



**LAP APPENDIX C**  
**Frontline Staff Survey**

1. In a typical month in your role, how many times do you encounter an LEP passenger?
  - Three times a year or less
  - Once a month or less
  - Between once a month and once a week
  - 2 – 3 times per week
  - 4 – 9 times per week
  - 10 or more times per week
  
2. When you have come across an LEP passenger, which of these methods have you used to communicate with them?
  - I've never encountered an LEP passenger while working.
  - Language Line telephone interpretation service
  - Communicate in any English the passenger is able to speak or write, however limited
  - Communicate in another language that you both speak. Language(s): \_\_\_\_\_
  - Gestures, pointing, etc.
  - Technology such as Google Translate or Google Interpreter
  - Show the passenger printed brochures or signs translated into their language
  - Refer the passenger to a nearby passenger who speaks their language
  - Communicate through a person traveling with the passenger who speaks English and can interpret
  - Avoid communicating with the passenger
  - Other:
  
3. When a LEP passenger approaches you for help, how confident do you feel that you'll be able to help them?
  - Not confident at all
  - Somewhat confident
  - Mostly confident
  - Very confident
  
4. What, if anything, would help you feel more confident or prepared for interacting with LEP passengers?
  
5. Please share anything you've learned or noticed in your interactions with LEP riders that would be useful for us to know, so we can serve them better in the future.